

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES, et al.,

Defendants.

Case No. 1:25-cv-11048-ADB

**DECLARATION OF STEVEN P. LEHOTSKY IN SUPPORT OF
PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

I, Steven P. Lehotsky, declare as follows:

1. I am a partner at the law firm of Lehotsky Keller Cohn LLP and represent the President and Fellows of Harvard College (“Harvard” or “Plaintiff”) in this matter. I make this declaration in support of Plaintiff’s Motion for Summary Judgment. I have personal knowledge of the contents of this declaration and could testify thereto.

2. Attached to the SOF filed in this action as **Exhibit 1** is a true and correct copy of the e-mail from Josh Gruenbaum, Commissioner of the Federal Acquisition Service at the General Services Administration, to Alan M. Garber, President of Harvard University, dated March 31, 2025, with the subject line “Official notice: Task Force to Combat Anti-Semitism review of Federal Contracts and Grants Held by Harvard University.”

3. Attached to the SOF filed in this action as **Exhibit 2** is a true and correct copy of the letter from Harmeet K. Dhillon, Assistant Attorney General for the Civil Rights Division, to

Jennifer O'Connor, Vice President and General Counsel of Harvard University, dated April 11, 2025.

4. Attached to the SOF filed in this action as **Exhibit 3** is a true and correct copy of the letter from President Garber to Linda E. McMahon, Secretary of Education, dated May 12, 2025.

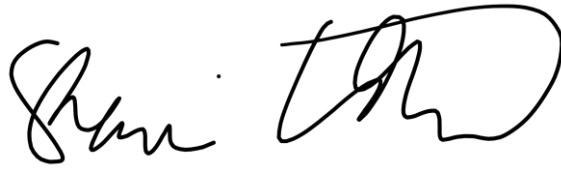
5. Attached to the SOF filed in this action as **Exhibit 4** is a true and correct copy of the Letter from Kristi Noem, Secretary of Homeland Security, to Maureen Martin, Director of Immigration Services, Harvard International Office, dated May 22, 2025.

6. Attached to the SOF filed in this action as **Exhibit 5** is a true and correct copy of the Letter from Craig S. Burkhardt, Deputy Under Secretary of Commerce for Standards and Technology and Deputy Director and Acting Director of the National Institute of Standards and Technology at the Department of Commerce, to President Garber, dated May 12, 2025.

7. Attached to the SOF filed in this action as **Exhibit 6** is a true and correct copy of the Letter from Jamie W. Legier, Director of the Office of Grants Services at the Centers for Disease Control and Prevention, to President Garber, dated May 19, 2025.

8. Attached to the SOF filed in this action as **Exhibit 7** is a true and correct copy of the Letter from Josh Gruenbaum to Agency Senior Procurement Executive, dated May 27, 2025.

Executed this 2nd day of June 2025, in West Newton, Massachusetts.

A handwritten signature in black ink, appearing to read "Steven P. Lehotsky", written over a horizontal line.

Steven P. Lehotsky